From: Thomas Conway

To: Gowers, Joe; Seppi, Pat

Cc: Lopez, Peter

Subject: Ringwood Mines/Landfill Superfund Site Comments (OU3)

Date: Monday, May 04, 2020 4:46:00 PM

Comments on the Proposed Cleanup Plan to Address Groundwater Contamination at the Ringwood Mines/Landfill Superfund Site

Mr. Gowers:

First, I am shocked that the comment period was not extended again. I realize that another extension would be very unusual, but these are unusual times. Please forgive any errors and the lack of sources cited.

Ringwood is surrounded by parks and as the Environmental Chair; I have had to spend considerable time dealing with the ATV invasion brought on by park closures. I fight every day to keep my business running while also trying to responsibly provide for my family. Needless to say, I have not been able to find the time to prepare proper comments for the terrible plan the EPA has proposed for the Groundwater. It is unconscionable for the EPA to keep this timeline in light of the worldwide catastrophe that is tying up many resources. Unfortunately, it does continue a pattern of the EPA trying to mute the public and close this Superfund site. Even the meeting in February was given very short public notice.

Your April 1 letter says: "To view the EPA's proposed plan for the groundwater and mine water at the site, please visit www.epa.gov/superfund/ringwood-mines". This link goes to a page that does not exist. The incompetence by the EPA is so profound that it seems intentionally misleading.

I believe this plan has major shortcomings. Without the time to fully expound on them all, I am forced to jot down this quick summary.

- 1. The EPA methodology does not seem to account for people living above this entire area. I would like to see more research on vapors from the contamination.
- 2. Phytoremediation seems ideal for groundwater remediation. Why is this not being tested or even proposed? This is the perfect site for phytoremediation.
- 3. The monitoring wells may not work. The EPA says it cannot determine the source of the contamination, yet it will setup monitoring wells. Seems like double speak. The source is Peter's Mine and it should be pumped and treated.
- 4. We have no idea what is below the airshaft in the mines. The alternatives discussed for cleaning the airshaft are equivalent to cleaning a cove in a lake. Your reports indicate 50 gallons of water an hour move up and out of the airshaft. Clearly there are millions of gallons of tainted water below this grade and you are only modeling for the amount in the airshaft.
- 5. No one knows the water pathways there. That's a fact. Yet you write that the monitoring wells will be sufficient. This is a shot in the dark or worse, just scraping the surface.

- 6. Is there any concern that bedrock aquifer wells will create new pathways for the water to reach the surface?
- 7. The report correctly acknowledges that oxygenation will help naturally attenuate some of the contaminants. Is there a risk that some of this may escape in gaseous form and hurt the residents?
- 8. The water patterns are unknown. Five years between monitoring events seems too long.

Please extend the comment period. We need more time to fully review this proposal. This is a decades-long Superfund site and it seems rushed to force this solution through during the Covid19 crisis. This would be a new low for the EPA at this site and the EPA has already shot through the floor a few times.

Regards,
Thomas Conway
Chair, Ringwood Environmental Commission